

## **R E M A R K S**

Claims 1 through 14 are in the application, with Claim 7 having been amended. Claims 1, 3, 7 and 11 are independent.

Claims 1 through 14 are subject to a restriction requirement. In particular, the Office Action groups the claims into Claims 1 through 6 and 11 through 14 (Group I), and Claims 7 through 10 (Group II).

Applicant provisionally elects the Group I claims. This provisional election is made with traverse. Applicant requests reconsideration of the restriction requirement in light of the above amendments and the following arguments, and pursuant to 37 CFR §1.143. As grounds for traversal, Applicant believes that the restriction requirement does not satisfy the test for “distinctness” set forth in MPEP §806.05(f).

According to §806.05(f) (and contrary to Form Paragraph 8.18 quoted in the Office Action), a process of making and a product made by the process can be shown to be distinct inventions if either or both of the following can be shown: (A) that the process as claimed is not an obvious process of making the product and the process as claimed can be used to make other and different products; or (B) that the product as claimed can be made by another and materially different process. The Office Action indicates that prong (B) is satisfied by the present claims, and describes a process to make the claimed product that is alleged to be materially different from the claimed process.

Applicant submits that the described process is not materially different from the claimed process. For example, amended independent Claim 7 describes a process for placing a plurality of integrated circuit die on respective ones of a plurality of mounting locations of an integrated circuit package substrate, and placing a stiffener strip on the integrated circuit package substrate. The plurality of integrated circuit die and the plurality of mounting locations are disposed in respective ones of a plurality of openings defined by the stiffener strip.

This process of amended Claim 7 reads directly on the process described in the Office Action, and therefore cannot be seen as being materially different therefrom. In particular, Claim 7 reads at least on a process in which a stiffener with openings is placed on an integrated circuit package substrate, and on a process in which a stiffener without openings is placed on an integrated circuit package substrate and the openings are formed thereafter.

In view of the foregoing, Applicant respectfully requests withdrawal of the outstanding restriction requirement and examination of Claims 1 through 14 on the merits. In this regard, Claims 1 through 14 are believed to be in condition for allowance and such action is respectfully requested at the Examiner's earliest convenience.

### CONCLUSION

Applicant therefore requests withdrawal of the outstanding restriction requirement and examination of Claims 1 through 14 on the merits. In this regard, Claims 1 through 14 are believed to be in condition for allowance and such action is respectfully requested at the Examiner's earliest convenience.

If there remains any question regarding the present application, or if the Examiner has any suggestions for expediting allowance of the present application, the Examiner is cordially requested to contact the undersigned via telephone at (203) 972-0049.

Respectfully submitted,

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Date



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